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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHOSH YONAY, an individual, and
YUVAL YONAY, an individual,

Plaintiffs,

v.

PARAMOUNT PICTURES
CORPORATION, a Delaware
corporation, and DOES 1-10,

Defendants.

Case No. 2:22-cv-03846-PA-GJS

**JOINT STIPULATION
REGARDING MODIFICATION
OF TRIAL AND PRETRIAL
DATES**

District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish

STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“Paramount”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, on January 6, 2023, the Court entered an order bifurcating discovery into separate liability and damages phases and setting a Schedule of Trial and Pretrial Dates;

WHEREAS, under the current Schedule of Trial and Pretrial Dates, the Parties must exchange liability expert reports by May 12, 2023, with liability rebuttal expert reports due by June 2, 2023, and liability discovery closing on July 7, 2023;¹

WHEREAS, Plaintiffs’ counsel, Marc Toberoff, is scheduled to undergo two important medical surgeries which will severely limit his ability to work on this case, including serving liability expert and rebuttal expert reports and otherwise responding to discovery requests;

WHEREAS, in light of Mr. Toberoff’s forthcoming medical surgeries, Plaintiffs have asked Paramount to agree to an approximately 90-day extension of the Schedule of Trial and Pretrial Dates (and, in certain instances, fewer);

WHEREAS, Paramount has advised Plaintiffs that it does not oppose the requested extension subject to approval of the Court;

WHEREAS, these modifications will not meaningfully delay the overall progress of the case and may actually increase the efficient progression of the case.

Based on the foregoing, **IT IS HEREBY STIPULATED** by and between the Parties, through their respective counsel of record, subject to the Court’s approval, that:

1. The deadline to exchange liability expert reports and rebuttal liability

¹ See January 6, 2023 Minute Order (ECF No. 30).

1 expert reports shall be continued to July 7, 2023 and July 28,
2 respectively.

3 2. The liability discovery cut-off shall be continued to October 6, 2023.

4 3. The deadline for the Parties to file a motion for summary judgment
5 directed to liability issues shall be continued to October 23, 2023, with
6 the hearing date for such motion continued to December 4, 2023.

7 4. The deadline to exchange damages expert reports and rebuttal damages
8 expert reports shall be continued to January 5, 2024 and January 26,
9 2024, respectively.

10 5. The damages discovery cut-off is continued to February 23, 2024.

11 6. The deadline for the Parties to conduct a settlement mediation shall be
12 continued to March 11, 2024.

13 7. The motion hearing cut-off shall be continued to March 4, 2024.

14 8. The deadline to lodge pretrial conference order and pretrial exhibit
15 stipulations and to file final pretrial conference materials shall be
16 continued to March 21, 2024.

17 9. The final pretrial conference shall be continued to April 5, 2024 at
18 1:30 p.m.

19 10. The hearing on motions in limine and disputed jury instructions shall
20 be continued to April 29, 2024 at 1:30 p.m.

21 11. The deadline to lodge final trial exhibit stipulations shall be continued
22 to May 2, 2024.

23 12. The trial date shall be continued to May 7, 2024 at 9:00 a.m.
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1 Dated: May 12, 2023

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15 Dated: May 12, 2023

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26 *Corporation*
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SIGNATURE ATTESTATION

Pursuant to CACD Local Rule 5-4.3.4(a)(2)(i), I certify that I have obtained authorization to file this document from the other signatories to this document and that all other signatories have authorized placement of their electronic signature on this document.

Dated: May 12, 2023

O'MELVENY & MYERS LLP

By: /s/ Daniel M. Petrocelli

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